

**REQUIRED STATEMENT
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**

All Cases: Debtor(s) Doris M. Tipton Case No. 15-38267 Chapter 13

BANK OF NEW YORK MELLON TRUST COMPANY,
N.A. AS TRUSTEE FOR MORTGAGE ASSETS

All Cases: Moving Creditor MANAGEMENT SERIES 1 TRUST Date Case Filed 11/10/15

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☒ Other (describe) Dismissal

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed 03/11/2016

Chapter 7: ☐ No-Asset Report Filed on _____
☐ No-Asset Report not Filed, Date of Creditors Meeting _____

1. Collateral
 - a. ☒ Home
 - b. ☐ Car Year, Make, and Model _____
 - c. ☐ Other (describe) _____
2. Balance Owed as of 11/1/19 \$289,267.66
Total of all other Liens against Collateral \$0.00
3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.
4. Estimated Value of Collateral (must be supplied in *all* cases) \$350,000.00, per Debtor's Schedules
5. Default
 - a. ☒ Pre-Petition Default as of petition date
Number of months 0 Amount \$1,677.55
 - b. ☐ Post-Petition Default
 - i. ☐ On direct payments to the moving creditor
Number of months _____ Amount \$0.00
 - ii. ☐ On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount _____
6. Other Allegations
 - a. ☒ Lack of Adequate Protection § 362(d)(1)
 - i. ☐ No insurance
 - ii. ☐ Taxes unpaid Amount \$ _____
 - iii. ☐ Rapidly depreciating asset
 - iv. ☒ Other (describe) \$2,675.00 owed to Movant for advanced flood insurance
 - b. ☐ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
 - c. ☐ Other "Cause" § 362(d)(1)
 - i. ☐ Bad Faith (describe) _____
 - ii. ☐ Multiple Filings
 - iii. ☐ Other (describe) _____
 - d. Debtor's Statement of Intention regarding the Collateral
 - i. ☐ Reaffirm
 - ii. ☐ Redeem
 - iii. ☐ Surrender
 - iv. ☒ No Statement of Intention Filed

Date: December 9, 2019

(Rev. 12/21/09)

/s/ Joel P. Fonferko

Counsel for Movant